



THE CRCIA MANAGEMENT TEAM
OF THE
COLUMBIA RIVER COMPREHENSIVE IMPACT
ASSESSMENT

Chairman:
Gregory L. deBruler

6/11/99

Technical Representative of
the Confederated Tribes of the
Umatilla Indian Reservation:
Stuart G. Harris

Technical Representative of
the Nez Perce Tribe:
John Stanfield

Technical Representative of
the State of Oregon,
Steven P. Sautter

Technical Representative of
the Washington State
Department of Ecology:
David P. Holland

Technical Representatives of
the Yakama Indian Nation:
Wade H. Riggabau
Barbara L. Harper

Technical Representative of
the Hanford Advisory Board:
Gregory L. deBruler

Mr. Rich Holten
USDOE
Box 550
Richland, WA

Re: CRCIA and the Groundwater Vadose Zone Integration Project

Dear Mr. Holten,

The Columbia River Comprehensive Impact Assessment (CRCIA) Team continues to have reservations regarding how the CRCIA Part II requirements are used in the current Groundwater/Vadose Zone Integration Project. These reservations were intensified by your comments on CRCIA during the June 7, 1999 project meeting.

As a result of your comments on U.S. Department of Energy's (USDOE) commitment towards the CRCIA Part II requirements, the CRCIA Team requests clarification of the USDOE's position on the following issues:

- Does USDOE believe they have fulfilled their commitment, made in February 1998, to use the CRCIA as a "template" for a sitewide assessment? Please include either how and when USDOE believes this commitment has been met or how and when this commitment will be fulfilled.
- Will USDOE commit to do more than "talk" about CRCIA Part II requirement? USDOE contractors have been open and cooperative in their efforts to discuss and understand tribal and stakeholder concerns, especially those reflected in the CRCIA requirements. However, based on past experience, the CRCIA Team recognizes a distinct difference between the results of technical discussions and agreements between CRCIA Team members and USDOE contractors, and a commitment to performance and



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- funding by USDOE. What commitment will USDOE make to incorporate CRCIA-related requirements into a sitewide impacts assessment?
- Since the July 1997 USDOE decision to perform an assessment independent of a Tri-Party Agreement milestone and the CRCIA Team framework, how much has been spent on a sitewide impacts assessment? What has USDOE achieved?
- Finally, does USDOE believe CRCIA Team members and their respective organizations should remain involved with the GW/VZ Integration Project? If so, please explain why? During the past 18 months, there have been many opportunities for individual CRCIA Team members to dialogue with USDOE and its contractors. In addition, there has been significant progress on the part of many GW/VZ Integration Project technical staff in understanding CRCIA related requirements. However, USDOE has apparently stepped back from using CRCIA Part II as a "template" and has not incorporated these requirements into the assessment.

It was made quite clear in the June 7 GW/VZ Project meeting that USDOE has made no commitment to incorporate CRCIA requirements into the GW/VZ assessment effort. As a result, the CRCIA Team members have serious reservations concerning the value of continued participation in GW/VZ integration effort. The Team members believe they can best represent their respective organizations and governments by directing their energies and resources to efforts that will result in commitment and action, rather than endless non-committal dialogue.

The Team looks forward to your response which we hope will bring clarity to the above mentioned concerns. We request your response by June 30, 1999.

Sincerely,



Gregory deBruler
CRCIA Team Chair
P.O. Box 912
Bingen, WA 98605

Cc: Keith Klein
Dick French
Bob Alvarez

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